

object based on the positions of two cameras and the directions in which they point when directed toward the object, as illustrated in Figure 6.

The text at page 2, lines 2-4 also states:

"A representative construction of a three-dimensional structure estimation apparatus which employs a *conventional stereo method* is shown in FIG. 6."

From these passages it is believed to be clear that the application uses both of the terms "stereo method" and "triangulation" to describe the distance measuring method of Figure 6, and the two terms are therefore interchangeable.

The method of the claimed invention is illustrated in Figure 1 and is referred to in the application as the stereo method, for example in the Summary section at page 10, lines 22-23 where it is stated that "a conventional stereo algorithm can be utilized." This refers to the method shown in Figure 6, which is also referred to in the application as triangulation. Comparison of Figure 1 to Figure 6 shows that the two methods are different in that the cameras of Figure 1 have different visual fields or different resolutions, but are the same in that both use stereo imaging or triangulation, since both determine the distance to an object based on the positions of the cameras and the directions in which they point when directed toward the object.

For these reasons applicant believes that the substitution of the term "triangulation" for "stereo imaging" is supported in the application. The examiner has acknowledged that triangulation is a well-known method and it is believed that any person familiar with the art will recognize that the term triangulation applies to the method referred to in the present application as both triangulation and stereo imaging. Applicant notes that the substitution of the term "triangulation" for the term "stereo method" was meant to clarify the distinction between the claimed invention and the method employed in the Auty reference. Briefly, the Auty reference determines distance to an object using two cameras, however those cameras image the object along the same line of sight. For this reason it is believed to be clear that Auty does not perform stereo imaging as that term is used in the present application and as that term is generally understood in the art. However, to advance the prosecution of this

case, applicant has substituted the equivalent term "triangulation" so that there could be no misunderstanding as to the distinction between Auty and the claimed invention. It is believed that this term is supported and is useful to distinguish the claimed invention from the cited references. Therefore it is believed that the objection should be withdrawn.

Prior art rejection

The claims were rejected on the same grounds as stated in the previous rejection. Applicant's previous reply demonstrated that the explanations of the prior art references provided in the official action are inaccurate and that the prior art references do not support a rejection of the claims. Those arguments are incorporated herein by reference.

Because the same rejection continues to be made, applicant will appeal the rejection. A notice of appeal is submitted herewith and applicant's appeal brief will be submitted in due course.

Respectfully submitted,

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FOLEY & LARDNER
Washington Harbour
3000 K Street, N.W., Suite 500
Washington, D.C. 20007-5109
Telephone: (202) 672-5407
Facsimile: (202) 672-5399

By Ronald Coslick
Ronald Coslick
Attorney for Applicant
Registration No. 36,489